

**REMARKS**

The final Office Action rejects claims 1-6 and 9-24 under 35 U.S.C. § 112, second paragraph, as being incomplete; rejects claims 25-33 and 37-45 under 35 U.S.C. § 102(e) as anticipated by BHARAT et al. (U.S. Patent No. 6,112,203); rejects claims 34-36 under 35 U.S.C. § 103(a) as unpatentable over BHARAT et al.; rejects claims 1, 3-6, 20-33, and 37-45 under 35 U.S.C. § 102(e) as anticipated by KLEINBERG (U.S. Patent No. 6,112,202); and rejects claims 2, 7-19, 34-36, and 46-61 under 35 U.S.C. § 103(a) as unpatentable over KLEINBERG in view of LIDDY et al. (U.S. Patent No. 5,963,940). Applicants respectfully traverse the above rejections. Claims 1-61 remain pending.

**REJECTION UNDER 35 U.S.C. § 112, SECOND PARAGRAPH**

Claims 1-6 and 9-24 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly incomplete for omitting essential structural cooperative relationships of elements. In particular, the Office Action alleges that "[t]here is no nexus between the search object selected '**while** the one or more groups of characters in the document are highlighted' [emphasis added] in the independent claims in this group. In particular, the selected search object is not stated to be one of, nor dependent on, nor associated with, the highlighted groups" (final Office Action, pg. 6).

Claim 1 recites, *inter alia*, selecting a search object while the one or more groups of characters are highlighted in the document. Applicants submit that the search object may or may not be dependent on or associated with the highlighted one or more groups of characters. Applicants note that claims are not to be read in a vacuum, but rather should be read in light of Applicants' Specification. As set forth in Applicants' Specification, the search object may, for example, correspond to a button on a toolbar or a menu item and the selection of this search

object causes a search query to be generated using the selected one or more groups of characters (see, for example, page 12 of Applicants' Specification, which clearly describes that the browser assistant may detect the selection of a word, phrase, paragraph, etc. in response to an action by the user and page 9 of Applicants' Specification, which clearly describes that tool bar 410 includes software buttons and/or menus selectable by a user to initiate different operations by the browser assistant). So, for example, a user may highlight one or more groups of characters in a document and select (e.g., click) a search object, such as, for example, a button or menu item, to cause the browser assistant to generate a search query using the highlighted one or more groups of characters. These features are supported by Applicants' Specification and broadly covered by Applicants' claim 1.

Therefore, the search object may not be dependent on or associated with the highlighted one or more groups of characters. Instead, the search object may, for example, be associated with a browser that presents the document in which the one or more groups of characters are highlighted to the user (see, for example, Fig. 4). Contrary to the final Office Action's position, the fact that the selected search object is not specifically recited as being dependent on or associated with the highlighted one or more groups of characters does not render this claim incomplete for omitting essential structural cooperative relationships.

Further with respect to this rejection, the final Office Action alleges that "[d]ependent claims 4-17 support the interpretation that what is described on page 12 [of Applicants' Specification] is the derivation of a query, not an object distinct from the query" (final Office Action, pg. 2). Applicants respectfully disagree.

As set forth above, selection of the recited search object causes a search query to be

generated. This is clearly recited in claim 1 - "generating a search query using the selected one or more groups of characters in response to selecting the search object" (emphasis added).

For at least the foregoing reasons, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn.

Claims 2-6 and 9-19 depend from claim 1. Therefore, Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn for at least the reasons given above with respect to claim 1.

Independent claims 20-24 recite features similar to features described above with respect to claim 1. Therefore, Applicants respectfully request that the rejection of claims 20-24 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn for at least reasons similar to reasons given above with respect to claim 1.

**REJECTION UNDER 35 U.S.C. § 102 BASED ON BHARAT ET AL.**

Claims 25-33 and 37-45 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by BHARAT et al. Applicants respectfully traverse this rejection.

A proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. See M.P.E.P. § 2131. BHARAT et al. does not disclose or suggest the combination of features recited in claims 25-33 and 37-45.

For example, independent claim 25 is directed to a method for prefetching documents associated with a search. The method includes identifying a document that includes one or more links, where each of the links corresponds to a linked document; analyzing each of the links in the document; determining a score for each of the links; and prefetching a number of the linked

documents corresponding to a number of the links based on the determined scores. BHARAT et al. does not disclose or suggest this combination of features.

For example, BHARAT et al. does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links. The final Office Action relies on col. 3, lines 17-20, of BHARAT et al. as allegedly disclosing this feature (final Office Action, pg. 2). Applicants disagree.

At col. 3, lines 16-20, BHARAT et al. discloses:

A subset of documents, for example thirty, represented by the highest scoring nodes in the start-set are selected to form an expanded query topic. The topic is formed by concatenating the first, for example, one thousand words from each of the selected documents.

This section of BHARAT et al. discloses that a subset of documents from a start set, which is a set of documents retrieved by a search engine in response to a search query, can be selected to form an expanded query topic. This section of BHARAT et al. does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, as required by claim 25.

Further with respect to this feature, the final Office Action alleges "in the passage cited [COL 3 lines 17-20], a subset of the start set, 'for example thirty, represented by the highest scoring nodes' refers to scores determined according to their connectivity [COL 3 lines 10-15]" (final Office Action, pg. 3). Regardless of the veracity of this allegation, the final Office Action does not explain how selecting a group of documents for forming an expanded query topic, as disclosed by BHARAT et al., in any way relates to prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, as required by claim 25.

At col. 3, lines 10-15, BHARAT et al. discloses:

The nodes in the start set are first scored according to their connectivity, and the number of terms of the query that appear as unique sub-strings in the URL of the represented documents. The score is a weighted sum of the number of directed edges to and from a node and the number of unique sub-strings of the URL that match a query term.

This section of BHARAT et al. discloses scoring nodes in the first set. This section of BHARAT et al. in no way discloses or suggests prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, as required by claim 25.

The final Office Action further alleges "the start set is explicitly *fetches* [COL 4 line 67 and after] prior to extraction of the hyperlinks and other operations, and use of the connectivity is noted at the COL 3 lines 17-20 cited in order to prune the pages for further processing [COL 5 lines 26-37]" (final Office Action, pg. 3). This allegation does not address the above feature recited in claim 25.

Claim 25 does not merely recite fetching documents in a start set, as the final Office Action's allegation suggests. Instead, claim 25 specifically recites prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links. BHARAT et al. discloses producing a set of documents by combining the set of results from a web search engine in response to a search query with pages that either link to or are linked from the start set documents and scoring the documents in the start set (see col. 3, lines 3-13). BHARAT et al. further discloses selecting a subset of documents in the start set based on their scores to form an expanded query topic. BHARAT et al. does not disclose or suggest that the selected subset of documents are prefetched, as required by claim 25.

For at least the foregoing reasons, Applicants submit that claim 25 is not anticipated by BHARAT et al.

Claims 26-33 and 37-41 depend from claim 25. Therefore, these claims are not anticipated by BHARAT et al. for at least the reasons given above with respect to claim 25. Moreover, these claims recite additional features not disclosed or suggested by BHARAT et al.

For example, claim 28 recites receiving selection of one of the links in the document, determining whether the selected link corresponds to one of the prefetched documents, and providing the one prefetched document when the selected link corresponds to the one prefetched document. At the outset, Applicants submit that since BHARAT et al. does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, BHARAT et al. cannot disclose or suggest the above features of claim 28.

Nevertheless, with respect to claim 28, the final Office Action alleges "Bharat provides for both selection of one of the prefetched documents [claim 28] and related documents [claim 29]" (final Office Action, pg. 5). Applicants submit that the features recited in Applicants' claim 28 have been mischaracterized.

Claim 28 does not recite selection of one of the prefetched documents, as alleged in the final Office Action. Instead, claim 28 recites receiving selection of one of the links in the document, determining whether the selected link corresponds to one of the prefetched documents, and providing the one prefetched document when the selected link corresponds to the one prefetched document. The final Office Action does not address the features of claim 28. As such, a *prima facie* basis for denying patentability has not been established with respect to claim

28.

Further with respect to claim 28, the final Office Action alleges "[w]ith respect to the elements of claims 28-29, they correspond to simply providing a prefetched document as in Bharat because providing a document located through a link inherently requires accessing the link, following the link to the document, and then retrieving it" (final Office Action, pg. 4). Applicants submit that this allegation does not address the specific features recited in claim 28.

While accessing a document through a link may involve selection of the link, following the link to the document, and then retrieving the document, these acts in no way inherently include determining whether the selected link corresponds to one of the prefetched documents, as specifically required by claim 28. The final Office Action does not address this feature of claim 28.

For at least these additional reasons, Applicants submit that claim 28 is not anticipated by BHARAT et al.

Claim 29 recites retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents. At the outset, Applicants submit that since BHARAT et al. does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, BHARAT et al. cannot disclose or suggest the above feature of claim 29.

Nevertheless, with respect to claim 29, the final Office Action alleges "Bharat provides for both selection of one of the prefetched documents [claim 28] and related documents [claim 29]" (final Office Action, pg. 5). Applicants submit that the features recited in Applicants' claim 29 have been mischaracterized.

Claim 29 does not recite selection of related documents, as alleged in the final Office Action. Instead, claim 29 recites retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents. The final Office Action does not address the features recited in claim 29. As such, a *prima facie* basis for denying patentability has not been established with respect to claim 29.

Further with respect to claim 29, the final Office Action alleges "[w]ith respect to the elements of claims 28-29, they correspond to simply providing a prefetched document as in Bharat because providing a document located through a link inherently requires accessing the link, following the link to the document, and then retrieving it" (final Office Action, pg. 4). Applicants submit that this allegation does not address the specific feature recited in claim 29.

While accessing a document through a link may involve selection of the link, following the link to the document, and then retrieving the document, these acts in no way inherently include retrieving the linked document corresponding to the selected link from a server when the selected link does not correspond to one of the prefetched documents, as specifically required by claim 29. The final Office Action does not address this feature of claim 29.

For at least these additional reasons, Applicants submit that claim 29 is not anticipated by BHARAT et al.

Claim 32 recites that the prefetching includes prefetching the linked documents corresponding to all of the links in the document. At the outset, Applicants submit that since BHARAT et al. does not disclose or suggest prefetching a number of the linked documents corresponding to a number of the links based on the determined scores for the links, BHARAT et al. cannot disclose or suggest the above feature of claim 32.



Nevertheless, with respect to claim 32, the final Office Action alleges "nothing in Bharat precludes prefetching all of the links in a Web page, since *subset* includes an entire set as a possibility" (final Office Action, pg. 5). The final Office Action has not pointed to any section of BHARAT et al. that discloses prefetching all of the links in a document. As such, a *prima facie* basis for denying patentability has not been established with respect to claim 32.

For at least these additional reasons, Applicants submit that claim 32 is not anticipated by BHARAT et al.

Independent claims 42-45 recite features similar to features recited above with respect to claim 25. Therefore, Applicants submit that these claims are not anticipated by BHARAT et al. for at least reasons similar to reasons given above with respect to claim 25.

REJECTION UNDER 35 U.S.C. § 103 BASED ON BHARAT ET AL.

Claims 34-36 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over BHARAT et al. Applicants respectfully traverse.

Claims 34-36 depend from claim 25. Therefore, these claims are patentable over BHARAT et al. for at least the reasons given above with respect to claim 25. Moreover, these claims recite additional features not disclosed or suggested by BHARAT et al.

For example, claim 34 recites that the determining a score includes determining a clickthrough rate for each of the linked documents, determining a score for each of the linked documents based on the determined clickthrough rates, and associating the determined scores for the linked documents with the corresponding links. BHARAT et al. does not disclose or suggest these features.

For example, BHARAT et al. does not disclose or suggest determining a score for each of

the linked documents based on the determined clickthrough rates. The final Office Action admits that BHARAT et al. does not disclose this feature (final Office Action, pg. 6). The final Office Action alleges, however, that "these were well known measures applied to web sites as noted in the Specification, page 17 line 15 to page 18 line 3. It would have been obvious to one of ordinary skill in the art at the time of the invention to apply clickthrough and popularity to scoring documents such as web pages because these data are readily available and used to determine the usefulness of web sites" (final Office Action, pg. 6). Applicants disagree.

At the outset, Applicant notes that Applicants' Specification discloses that clickthrough measurements are commonplace in many current web sites (page 17, lines 18-19). Applicants' Specification in no way discloses or suggests that determining a score for each of the linked documents based on determined clickthrough rates, as required by claim 34, is commonplace.

The final Office Action has not pointed to any section of BHARAT et al. that provides motivation for modifying BHARAT et al. to determine a score for each of the linked documents based on determined clickthrough rates. The final Office Action's motivation for modifying BHARAT et al. to include the features of claim 34 is merely conclusory and insufficient for establishing a *prima facie* case of obviousness.

For at least these additional reasons, Applicants submit that claim 34 is patentable over BHARAT et al.

Claim 35 recites that the determining a score includes determining a popularity of each of the linked documents, determining a score for each of the linked documents based on the determined popularity, and associating the determined scores for the linked documents with the corresponding links. BHARAT et al. does not disclose or suggest these features.

For example, BHARAT et al. does not disclose or suggest determining a popularity of each of the linked documents or determining a score for each of the linked documents based on the determined popularity. The final Office Action admits that BHARAT et al. does not disclose these features (final Office Action, pg. 6). The final Office Action alleges, however, "these were well known measures applied to web sites as noted in the Specification, page 17 line 15 to page 18 line 3. It would have been obvious to one of ordinary skill in the art at the time of the invention to apply clickthrough and popularity to scoring documents such as web pages because these data are readily available and used to determine the usefulness of web sites" (final Office Action, pg. 4). Applicants disagree.

At the outset, Applicant notes that Applicants' Specification in no way discloses or suggests that determining a popularity of each of the linked documents and determining a score for each of the linked documents based on determined popularity, as required by claim 35, are commonplace. The final Office Action is clearly mischaracterizing Applicants' Specification.

The final Office Action has not pointed to any section of BHARAT et al. that provides motivation for modifying BHARAT et al. to determine a popularity of each of the linked documents and determine a score for each of the linked documents based on the determined popularity. The final Office Action's motivation for modifying BHARAT et al. to include the features of claim 35 is merely conclusory and insufficient for establishing a *prima facie* case of obviousness.

For at least these additional reasons, Applicants submit that claim 35 is patentable over BHARAT et al.

Claim 36 recites that the determining a popularity includes, for each of the linked

documents, determining a popularity of a web site containing the linked document, and associating the popularity of the web site to the linked document. BHARAT et al. does not disclose or suggest these features.

The final Office Action admits that BHARAT et al. does not disclose these features (final Office Action, pg. 6). The final Office Action alleges, however, "these were well known measures applied to web sites as noted in the Specification, page 17 line 15 to page 18 line 3. It would have been obvious to one of ordinary skill in the art at the time of the invention to apply clickthrough and popularity to scoring documents such as web pages because these data are readily available and used to determine the usefulness of web sites" (final Office Action, pg. 6). Applicants submit that the final Office Action's allegations in no way addresses the specific features recited in claim 36. Accordingly, the final Office Action has not established a *prima facie* case of obviousness with respect to claim 36.

Applicants again respectfully request that the features of claim 36 be addressed or the rejection withdrawn.

For at least these additional reasons, Applicants submit that claim 36 is patentable over BHARAT et al.

#### REJECTION UNDER 35 U.S.C. § 102 BASED ON KLEINBERG

Claims 1, 3-6, 20-33, and 37-45 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by KLEINBERG. Applicants respectfully traverse this rejection.

As set forth above, a proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. See M.P.E.P. § 2131. KLEINBERG does not

disclose or suggest the combination of features recited in claims 1, 3-6, 20-33, and 37-45.

For example, independent claim 1 recites a computer-implemented method for performing a search. The method includes obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document; generating a search query using the selected one or more groups of characters in response to selecting the search object; retrieving search results based on the search query; and presenting the search results to the user. KLEINBERG does not disclose or suggest the combination of features recited in claim 1.

For example, KLEINBERG does not disclose or suggest obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document. With respect to these features, the final Office Action alleges "Kleinberg notes that words and phrases that serve as hyperlinks, both of which correspond to groups of characters in a document, are highlighted in Web pages as a matter of common practice [COL 2 line 62 to Col 3 line 4]. Further, a mouse click activates one of the hyperlinks and downloads the corresponding page" (final Office Action, pg. 7). Applicants submit that the final Office Action has mischaracterized the above features of claim 1.

Claim 1 does not recite clicking on a hyperlink in a document via a mouse to download a corresponding page. Instead, claim 1 clearly recites obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting

the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document. Selection of a hyperlink in a document in no way relates to obtaining selection of one or more groups of characters in a document by highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document. The final Office Action has not addressed this combination of features.

At col. 2, line 62, to col. 3, line 4, KLEINBERG discloses:

If a word or phrase, appearing on a Web page, is configured as an hyperlink to another Web page, the word or phrase is typically given in a color which contrasts with the surrounding text or background, underlined, or otherwise highlighted. Accordingly, the word or phrase defines a region, on the graphical representation of the Web page, inside of which a mouse click will activate the hyperlink, request a download of the linked-to page, and display the page when it is downloaded.

This section of KLEINBERG discloses that a hyperlink may be highlighted in a web page and that a mouse click will activate the hyperlink. This section of KLEINBERG in no way discloses or suggests obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1. It is unclear how the final Office Action can reasonably allege that clicking on a highlighted hyperlink is equivalent to selecting a search object while the one or more characters are highlighted in a document.

The final Office Action also points to col. 5, lines 20-41, and col. 12, lines 1-48, of KLEINBERG and alleges "the embodiments of Kleinberg match those claimed" (final Office Action, pg. 7). These sections of KLEINBERG do not disclose or suggest obtaining selection of

one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1.

At col. 5, lines 20-41, KLEINBERG discloses:

However, it is believed that the invention has particular applicability to the World Wide Web. A user, having interest in a particular area of subject matter and seeking Web pages related to that subject matter, may advantageously use the invention to locate authoritative pages on that subject matter.

While the invention is primarily disclosed as a method, it will be understood by a person of ordinary skill in the art that an apparatus, such as a conventional data processor, including a CPU, memory, I/O, program storage, a connecting bus, and other appropriate components, could be programmed or otherwise designed to facilitate the practice of the method of the invention. Such a processor would include appropriate program means for executing the method of the invention.

Also, an article of manufacture, such as a pre-recorded disk or other similar computer program product, for use with a data processing system, could include a storage medium and program means recorded thereon for directing the data processing system to facilitate the practice of the method of the invention. It will be understood that such apparatus and articles of manufacture also fall within the spirit and scope of the invention.

This section of KLEINBERG discloses that KLEINBERG's invention may be performed as a method, by an apparatus, or implemented as an article of manufacture. This section of KLEINBERG in no way relates to obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1.

Col. 12, lines 1-48, KLEINBERG discloses that KLEINBERG's invention may be implemented using standard programming and/or engineering techniques using computer

programming software, firmware, hardware, or any combination or subcombination thereof.

This section of KLEINBERG in no way relates to obtaining selection of one or more groups of characters in a document currently accessed by a user, where the obtaining includes highlighting the one or more groups of characters in the document and selecting a search object while the one or more groups of characters are highlighted in the document, as required by claim 1.

Much of the above arguments were presented in Applicants' response filed April 19, 2005. None of these arguments were addressed in the final Office Action. Accordingly, a *prima facie* basis for denying patentability has not been established with respect to claim 1. If this rejection is maintained, Applicants again respectfully request that the above features of claim 1 be specifically addressed.

For at least the foregoing reasons, Applicants submit that claim 1 is not anticipated by KLEINBERG.

Claims 3-6 depend from claim 1. Therefore, these claims are not anticipated by KLEINBERG for at least the reasons given above with respect to claim 1.

Independent claims 20-24 recite features similar to features recited above with respect to claim 1. Therefore, Applicants submit that these claims are not anticipated by KLEINBERG for at least reasons similar to reasons given above with respect to claim 1.

Independent claim 25 is directed to a method for prefetching documents associated with a search. The method includes identifying a document that includes one or more links, where each of the links corresponds to a linked document; analyzing each of the links in the document; determining a score for each of the links; and prefetching a number of the linked documents corresponding to a number of the links based on the determined scores. KLEINBERG does not



disclose or suggest this combination of features.

For example, KLEINBERG does not disclose or suggest determining a score for each of the links in the document or prefetching a number of linked documents corresponding to a number of the links based on the determined scores. In fact, KLEINBERG does not disclose or suggest prefetching any linked documents. The final Office Action does not address these features. Instead, the final Office Action alleges "[t]he elements of **claims 1, 3-6, 25-33 and 37-45** are rejected in the analysis above and this claim is rejected on that basis" (final Office Action, pg. 7). The final Office Action addressed features recited in claims 20-24 (pg. 7). Claims 20-24 do not recite, however, determining a score for each of the links in the document or prefetching a number of linked documents corresponding to a number of the links based on the determined scores, as required by claim 25. Since the final Office Action did not address these features, a *prima facie* basis for denying patentability has not been established with respect to claim 25.

Applicants again respectfully request that the features of claim 25 be specifically addressed or the rejection withdrawn.

For at least the foregoing reasons, Applicants submit that claim 25 is not anticipated by KLEINBERG.

Claims 26-33 and 37-41 depend from claim 25. Therefore, these claims are not anticipated by KLEINBERG for at least the reasons given above with respect to claim 25. Moreover, these claims recite additional features not disclosed or suggested by KLEINBERG.

The final Office Action did not address the features recited in claims 26-33 and 37-41. Accordingly, a *prima facie* basis for denying patentability has not been established with respect to these claims. Applicants again respectfully request that the features of claims 26-33 and 37-41

be specifically addressed or the rejection of these claims withdrawn.

Independent claims 42-45 recite features similar to features recited in claim 25.

Therefore, these claims are not anticipated by KLEINBERG for at least reasons similar to reasons given above with respect to claim 25.

REJECTION UNDER 35 U.S.C. § 103 BASED ON KLEINBERG AND LIDDY ET AL.

Claims 2, 7-19, 34-36, and 46-61 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over KLEINBERG in view of LIDDY et al. Applicants respectfully traverse.

Claims 2 and 7-19 depend from claim 1. The disclosure of LIDDY et al. does not remedy the deficiencies in the disclosure of KLEINBERG set forth above with respect to claim 1. Therefore, claims 2 and 7-19 are patentable over KLEINBERG and LIDDY et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 34-36 depend from claim 25. The disclosure of LIDDY et al. does not remedy the deficiencies in the disclosure of KLEINBERG set forth above with respect to claim 25. Therefore, claims 34-36 are patentable over KLEINBERG and LIDDY et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 25.

Independent claim 46 is directed to a computer-implemented method for supplementing a document with links to related documents. The method includes analyzing a document to identify one or more pieces of information; determining a link to a related document for each of the identified pieces of information by performing a search of a set of documents based on each of the identified pieces of information; and adding the links to the document. KLEINBERG and

LIDDY et al. do not disclose or suggest this combination of features.

The final Office Action does not address the features of claim 46. Instead, the final Office Action alleges "[a]s to **claims 46-47**, selected subsets of a document or document corpus include identified pieces of information" and points to col. 5, lines 1-15, of LIDDY et al. for support (final Office Action, pg. 9). This allegation in the final Office Action in no way addresses the specific features recited in Applicants' claim 46. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 46.

At col. 5, lines 1-15, LIDDY et al. discloses:

Unless otherwise stated, the term "query" should be taken to mean text that is input for the purpose of selecting a subset of documents from a document database. While most queries entered by a user tend to be short compared to most documents stored in the database, this should not be assumed. The present invention is designed to allow natural language queries.

Unless otherwise stated, the term "word" should be taken to include single words, compound words, phrases, and other multi-word constructs. Furthermore, the terms "word" and "term" are often used interchangeably. Terms and words include, for example, nouns, proper nouns, complex nominals, noun phrases, verbs, adverbs, numeric expressions, and adjectives. This includes stemmed and non-stemmed forms.

This section of LIDDY et al. discloses definitions for the terms "query," "word," and "term."

This section of LIDDY et al. in no discloses or suggests any of the features recited in claim 46.

Applicants again respectfully request that the features of claim 46 be specifically addressed or the rejection of that claim be withdrawn.

For at least the foregoing reasons, Applicants submit that claim 46 is patentable over KLEINBERG and LIDDY et al., whether taken alone or in any reasonable combination.

Claims 47-55 depend from claim 46. Therefore, these claims are patentable over KLEINBERG and LIDDY et al., whether taken alone or in any reasonable combination, for at

least the reasons given above with respect to claim 46. Moreover, these claims recite additional features not disclosed or suggested by KLEINBERG and LIDDY et al.

The final Office Action did not address the features recited in claims 49-55. Accordingly, a *prima facie* case of obviousness has not been established with respect to claims 49-55. Applicants again respectfully request that the features of claims 49-55 be specifically addressed or the rejection of those claims be withdrawn.

Independent claims 56-60 recite features similar to features described above with respect to claim 46. Therefore, these claims are patentable over KLEINBERG and LIDDY et al. for at least reasons similar to reasons given above with respect to claim 46.

Independent claim 61 recites features similar to features described above with respect to claims 25 and 46. Therefore, this claim is patentable over KLEINBERG and LIDDY et al. for at least reasons similar to reasons given above with respect to claims 25 and 46.

Applicants note that, with respect to claims 2, 7-19, 34-36, and 46-61, the final Office Action alleges "**Official Notice** is taken that it is well known in the art at the time of the invention to apply Natural Language Processing [NLP] to determine queries" (final Office Action, pg. 8). Applicants submit that claims 2, 7-19, 34-36, and 46-61 do not recite using NLP to determine queries. Therefore, the above allegation in the final Office Action is not relevant the features recited in Applicants' claims 2, 7-19, 34-36, and 46-61.

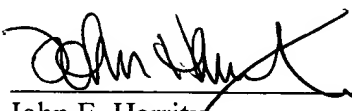
In view of the foregoing remarks, Applicants respectfully request the reconsideration of the application and the timely allowance of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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